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7 Attorney for Defendant
8 **GARY PARKINSON**

9
10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 **UNITED STATES OF AMERICA,**

13 Plaintiff,

14 vs.

15 **GARY PARKINSON, and**
16 **RAMON DESAGE.**

17 Defendant.

Case No. 2:13-CR-00039-JAD-VCF

**STIPULATION TO CONTINUE TRIAL
DISCLOSURE, PRETRIAL MOTION
DEADLINES AND STATUS CHECK
(SECOND REQUEST)**

18 IT IS HEREBY STIPULATED by and between GARY PARKINSON, Defendant, by and
19 through his counsel THOMAS F. PITARO, ESQ., RAMON DESAGE, Defendant, by and through
20 his counsel RICHARD WRIGHT, ESQ., and the United States of America, PATRICK BURNS,
21 Assistant United States Attorney, that the STATUS CHECK HEARING for the above-captioned
22 matter, currently scheduled for July 3, 2018 at the hour of 1:30 p.m., be vacated and continued to a
23 date and time convenient for this Court, but in no event earlier than two (2) weeks, and that the
24 deadline for the Government and the Defendants to file trial briefs, exhibit list, and witness lists,
25 previously scheduled for June 29, 2018, be vacated to July 20, 2018, and that the deadline for filing
26 any pretrial motions currently set for July 9, 2018 be vacated to July 20, 2018.

27
28 This Stipulation is entered into for the following reasons:

- 1 1. Calendar call and trial in this case are currently set for August 6 and 14, 2018,
2 respectively.
3
4 2. The Court previously ordered the Government and the Defendants to file their trial briefs,
5 exhibit lists, and witness lists by June 29, 2018. The Court also scheduled a deadline for
6 motions to be filed by July 9, 2018.
7
8 3. Counsels have spoken to AUSA Patrick Burns and he has no objections.
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10 4. Counsels for Defendants Parkinson and Desage are currently engaged in productive
11 negotiations that may resolve the case without trial.
12
13 5. Counsel for Defendant Desage has just concluded his murder trial and needs additional
14 time to go over offer with his client.
15
16 6. The additional time requested by this stipulation, is excludable in computing the time
17 within which the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C. 3161(h)(8)
18 (A), considering the factors under 18 U.S.C. 3161 (h)(8)(B)(i) and 3161 (h)(8)(B)(iv).
19
20 7. This is the second request for a continuance herein.

21 **DATED** this 2nd day of July, 2018.

22 PITARO & FUMO, CHTD.

United States Attorney

23 /s/ Thomas F. Pitaro

/s/ Patrick Burns

24 THOMAS F. PITARO, ESQ.
25 Attorney for PARKINSON

PATRICK BURNS
Attorney for USA

26 /s/ Richard Wright, Esq.

27 RICHARD WRIGHT, ESQ.
28 Attorney for DESAGE

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

GARY PARKINSON, and
RAMON DESAGE.

Defendant.

Case No. 2:13-CR-00039-JAD-VCF

FINDINGS OF FACT AND ORDER

Based on the pending Stipulation of counsel, and good cause appearing therefore, the

Court finds that:

1. Calendar call and trial in this case are currently set for August 6 and 14, 2018, respectively.
2. The Court previously ordered the Government and the Defendants to file their trial briefs, exhibit lists, and witness lists by June 29, 2018. The Court also scheduled a deadline for motions to be filed by July 9, 2018.
3. Counsels have spoken to AUSA Patrick Burns and he has no objections.
4. Counsels for Defendants Parkinson and Desage are currently engaged in productive negotiations that may resolve the case without trial.
5. Counsel for Defendant Desage has just concluded his murder trial and needs additional time to go over offer with his client.

6. The additional time requested by this stipulation, is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C. 3161(h)(8) (A), considering the factors under 18 U.S.C. 3161 (h)(8)(B)(i) and 3161 (h)(8)(B)(iv).

_____7. This is the second request for a continuance herein.

ORDER

IT IS FURTHER ORDERED, that the deadline for the Government and the Defendants to file any trial briefs, witness lists, and exhibits lists in *United States v. Ramon Desage, et.al.*, 2:13-cr-039-JAD-VCF, previously scheduled for June 29, 2018 is vacated and reset to July 20, 2018. The deadline for filing any pretrial motions currently scheduled for July 9, 2018 be vacated and reset to July 20, 2018.

IT IS FURTHERED ORDERED, that the Status Check currently scheduled for July 3, 2018 be vacated and reset to July 23, 2018 at 1:30 p.m.

DATED this 3rd day of July, 2018.

UNITED STATES DISTRICT JUDGE